

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : CHAPTER 13

Andrew J. Reed :
DEBTOR : BKY. NO. 17-10567JKF13
Andrew J. Reed :
Plaintiff :
vs. : ADV. NO.
Nationstar Mortgage ,LLC
d/b/a Mortgage Company
Champion Mortgage Company :
Defendant :

COMPLAINT TO DETERMINE SECURED STATUS

1. Debtor filed for protection under Chapter 13 on January 25, 2017.
2. Debtor owes his residence known as 2718 W. York Street, Philadelphia, PA with a value of \$21,036. **Exhibit A**
3. Debtor owns the property subject to an inherited reverse mortgage with defendant Nationstar who has filed a claim for \$40,104.27
4. Debtor has superior liens on Nationstar as follows:

City of Philadelphia (real estate)	\$1,035.27
City of Philadelphia (water and sewage)	\$730.42
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	Total : \$1,765.69

5. Based on the above the allowed secured claim of the mortgage is \$19,270.31.
6. Debtor seeks an order finding the secured claim to be \$19,270.3.

WHEREFORE, Debtor prays that this Honorable Court enter an order determining the secured claim of the defendant to be \$19,270.31.

Respectfully submitted,

Date: **July 17, 2017**

BY: /s/ Michael A. Cataldo
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